

**LEVIN-EPSTEIN & ASSOCIATES, P.C.**

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August 4, 2025

**Via Electronic Filing**

The Hon. Robyn F. Tarnofsky, U.S.M.J.  
U.S. District Court, Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *Gonzalez et al v. Tecton Cafe Inc. et al*  
Case No.: 25-cv-02288

Dear Honorable Magistrate Judge Tarnofsky:

This law firm represents Defendants Jin Ramen Corporation, Jin Rame Hamilton Heights Corporation, Chokolat Patisserie Corporation, Ifan Chang, and Jenny H. Ko (collectively, the “Defendants”) in the above-referenced matter.

Pursuant to Section 7 of Your Honor’s June 26, 2025 Case Management Plan and Report of Rule 26(f) Conference [Dckt. No. 23], this letter respectfully serves to provide the Court with a status update.

Defendants propounded discovery requests on July 2, 2025. As of the date of this filing, Plaintiffs Jaime Gonzalez, and Andres Fuentes (together, the “Plaintiffs”) have not provided any responses to Defendants’ discovery requests.

Plaintiffs propounded discovery requests on August 1, 2025.

Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

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VIA ECF: All Counsel